

1 WILLIAM J. GEDDES
Nevada Bar No. 6984
2 KRISTEN R. GEDDES
Nevada Bar No. 9027
3 THE GEDDES LAW FIRM, P.C.
1575 Delucchi Lane, Suite 206
4 Reno, Nevada 89502
Phone: (775) 853-9455
5 Fax: (775) 299-5337
Email: Will@TheGeddesLawFirm.com
6 Email: Kristen@TheGeddesLawFirm.com
Attorneys for Plaintiffs

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DAVID MUSTARD, an individual; NICOLE
11 ERICKSEN, an individual; and, TIMOTHY
SMITH, an individual,

12 Plaintiffs,

13 vs.

14 COMSTOCK MINING, INC.; a domestic
15 corporation; CORRADO DeGASPERIS, an
individual; SCOTT JOLCOVER, an individual;
16 LEO DROZDOFF, an individual; WALTER
MARTING, JR., an individual; WILLIAM
17 NANCE, an individual; J. CLARK GILLAM,
an individual,

18 Defendants.

CASE NO: 21-cv-378-MMD-CLB

**STIPULATION AND PROPOSED ORDER
TO ENLARGE TIME TO OPPOSE
DEFENDANTS' MOTION TO DISMISS**

[FIRST REQUEST]

19 COMES NOW Plaintiffs DAVID MUSTARD, NICOLE ERICKSEN, and TIMOTHY SMITH,
20 and Defendants COMSTOCK MINING, INC., CORRADO DeGASPERIS, SCOTT JOLCOVER, LEO
21 DROZDOFF, WALTER MARTING, JR., WILLIAM NANCE, and J. CLARK GILLAM, by and
22 through their undersigned attorneys of record, and hereby stipulate and agree that Plaintiffs shall have a
23 30-day enlargement of time to oppose Defendants' Motion to Dismiss (ECF Nos. 006 and 007),
24 through and including **Monday, March 7, 2022**. Correspondingly, Defendants shall have 30-days to
25 file any replies to Plaintiff's opposition, up to and including to **Wednesday, April 6, 2022**. This is the
26 parties' first request to extend these deadlines. The parties submit that this request is not for the

27 ///

28 ///

1 purpose of undue delay, but arises from caseload and calendaring issues.

2 Dated this 3rd day of February 2022.

Dated this 3rd day of February 2022.

3 THE GEDDES LAW FIRM, P.C.

MCDONALD CARANO LLP

4 /s/ Electronic Signature Authorized

/s/ Electronic Signature Authorized

5 WILLIAM J. GEDDES

SARAH FERGUSON

6 Nevada Bar No. 6984

Nevada Bar No. 14515

KRISTEN R. GEDDES

100 W. Liberty Street, Tenth Floor

7 Nevada Bar No. 9027

Reno, NV 89501

8 1575 Delucchi Lane, Suite 206

Phone: (775) 788-2000

9 Reno, Nevada 89502

sferguson@mcgondaldcarano.com

10 Phone: (775) 853-9455

Attorneys for Defendants

11 Fax: (775) 299-5337

Email: Will@TheGeddesLawFirm.com

Email: Kristen@TheGeddesLawFirm.com

Attorneys for Plaintiffs

12 II.

13 ORDER

14 IT IS SO ORDERED.

15 Dated: February 7, 2022

16 

17 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **February 3, 2022**, I caused to be served a copy of the foregoing *Stipulation and Proposed Order to Enlarge Time To File Opposition to Motion to Dismiss* by electronic filing with the Court's PACER e-filing system, addressed to:

Sarah Ferguson, Esq.
MCDONALD CARANO LLP
100 W. Liberty Street, Tenth Floor
Reno, NV 89501
sferguson@mcgondaldcarano.com
Attorneys for Defendants

/s/ Kristen Geddes
An employee of the Geddes Law
Firm, P.C.